

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

HOMEVESTORS OF AMERICA, INC.,	§	
Plaintiff,	§	Case No.: 1:24-MC-01344-DII
	§	Underlying Litigation
v.	§	C.A. No. 22-1583-RGA
	§	United States District Court
WARNER BROS. DISCOVERY, INC.,	§	For the District of Delaware
Defendant.	§	

Declaration of Hannah Waldman

1. I am attorney licensed to practice law in the state of California and an associate at Greenberg Glusker Fields Claman and Machtinger admitted pro hac vice in this matter to Western District of Texas. Except as otherwise stated, the statements contained herein are based upon my own personal knowledge and, if called as a witness, I would testify competently thereto.

2. I represent Warner Bros. Discovery, Inc. in the litigation pending in the District of Delaware with the case caption *HomeVestors of America, Inc. v. Warner Bros. Discovery, Inc.*, C.A. No. 22-1583 (D. Del.).

3. On September 26, 2024, Aaron J. Moss, a partner at Greenberg Glusker and counsel for Warner Bros. Discovery Inc., took the deposition of Charles Calise. A true and correct copy of the deposition transcript is attached as **Exhibit 1**. HomeVestors of America, Inc. has designated the contents of the deposition as Confidential – Attorneys’ Eyes Only under the operative protective order in the underlying litigation.

4. On September 27, 2024, Mr. Moss took the deposition of Lawrence Goodman, plaintiff HomeVestors’ current CEO. A true and correct copy of Mr. Goodman’s deposition transcript is attached as **Exhibit 2**. HomeVestors of America, Inc. has designated the contents of

the deposition as Confidential – Attorneys’ Eyes Only under the operative protective order in the underlying litigation.

5. On September 29, 2024, I sent an email to Plaintiff’s counsel requesting documents referenced in the deposition of Charlie Calise, as well as additional deposition time. A true and correct copy of this email exchange is attached as **Exhibit 3**.

6. On October 15, 2024, Mr. Moss took the deposition of David Hicks, plaintiff HomeVestors’ CEO who resigned in 2023. A true and correct copy of Mr. Hicks deposition transcript is attached as **Exhibit 4**. HomeVestors of America, Inc. has designated the contents of the deposition as Confidential – Attorneys’ Eyes Only under the operative protective order in the underlying litigation.

7. On November 6, 2024, attorney Steven Callahan agreed to accept email service of the Motion to Compel Compliance with Rule 45 Subpoena on behalf of Calise Partners, LLC. A true and correct copy of this email, on which I was copied, is attached as **Exhibit 5**.

8. Warner Bros. Discovery, Inc. and HomeVestors of America, Inc. entered into a protective order in the underlying litigation, a true and correct copy of which is attached as **Exhibit 6**. While WBD does not believe that Exhibits 1–4 contain any confidential information, WBD is obligated to request leave to file unredacted copies of these exhibits under seal pursuant to the terms of the protective order.

I declare under penalty of perjury that the foregoing is true and correct.

Hannah Waldman

Hannah G. Waldman